

Regarding SMSE-011-17 and associated comments as posted on ISED website 14 November 2017

Consultation on New requirements for Wireless Device Testing Laboratories

RN Electronics Ltd is a UK based independent EMC and Radio test laboratory.

RN Electronics Ltd comments of 29 November 2017.

RN Electronics Ltd is in agreement with the majority of proposals in the document SMSE-011-17; however, we do offer the following comments for ISED's consideration;

Comment 1.

In relation to paragraph 29: "Proposed transition period and renewal period for accreditation of testing laboratories".

We feel that the transition period of 6 months is not long enough for transition to the new requirements. We suggest a minimum of 1 year be allowed from notification on ISED website, in order for a Test lab to apply for and obtain accreditation. Regarding the proposed 2 year renewal of accreditation, we agree with the proposal as it aligns with other accreditation entities requirements for accreditation renewal.

Comment 2.

In relation to Annex B: "Procedure for the recognition of foreign testing laboratories".

Annex B.4 (a) – States that the Test laboratory is accredited to the latest ISO/IEC 17025. Due to the imminent release of a new version of ISO/IEC 17025, we believe that a suitable transition period (at least 2 years) should be allowed for Test laboratories to become accredited to the latest version. This would allow the Designating Authorities themselves to align with the new version before then being able to accredit test laboratories.

Comment 3.

In relation to Annex D: "Proposed changes to related documents"

In Relation to RSS-GEN it states

"Test sites currently listed with the CEB Test Site filing program will remain registered for six months from the date this proposal comes into effect. After which, the CEB Test Site filing program will only maintain accredited test sites."

We recommend that test site filings remain listed in line with the transition period eventually decided upon in paragraph 29.

Thank you for the opportunity to provide comments,

Yours with respect,

Daniel Sims

Radio Approvals Manager

e-mail: Daniel@RNelectronics.com

tel: +44 (0)1277 352219

web: www.RNelectronics.com